

# Brock Fredin

Baldwin, WI 54016 • Phone: (612) 424-5512 •  
E-Mail: brockfredinlegal@icloud.com

Date: January 29, 2020

## **BY PACER**

Hon. Magistrate Judge Hildy Bowbeer  
United States District Court  
316 Robert St N  
Saint Paul, MN 55101

Re: *Fredin v. Miller, Case No. 19-CV-3051-SRN-HB*

Dear Judge Bowbeer:

I write in response to Mr. Ballinger's January 29, 2020 letter. Ms. Miller was served on December 29, 2019. Her answer was due on January 19, 2020. Mr. Ballinger and Breyer have not filed a notice of appearance in this case. I object to Mr. Ballinger setting any briefing schedule until Mr. Ballinger and Breyer file a notice of appearance.

Because Mr. Ballinger and Breyer have not filed a notice of appearance, I respectfully request this Court ignore any letters or pleadings until such time they file a notice of appearance. I believe the reason they have failed to do so is because they expect I will file a motion to disqualify their representation.

Mr. Ballinger and Breyer are both former partners of Lindquist and Vennum. Lindquist and Vennum partners Michael Olafson and Mark Jacobson acted as mediators in both state court underlying civil orders. In that role, they gained privileged information which I have alleged was leaked to former Lindquist associate Lindsey Middlecamp by the mediators and/or Peter R. Mayer of Dorsey and Whitney and published in the tabloid media. Specifically, allegations related to a pending deposition of Defendant Schaefer and email addresses among other information. These are all alleged violations of Minn. R. Prof. Cond. Rule 3.7 (Attorneys as Witnesses) Rule 1.12 (Mediators), and Rule 1.9.

The reasoning has already been articulated in a motion to disqualify in *Fredin v. City Pages*, Case No. 19-CV-472, [Doc 67]. Additionally, because Peter R. Mayer is a Dorsey and Whitney associate, Mr. Lancaster's notice of appearance would likely violate Rule 3.7 when the violation is imputed to the entire Dorsey and Whitney firm. This is particularly so when Mr. Mayer was involved in the same mediation with Lindquist partners.

I thank the Court's for its attention to this matter and its continued courtesies.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Brock Fredin". The signature is stylized with a large, looped "B" and a cursive "Fredin".

s/ Brock Fredin

Brock Fredin

cc: Peter M. Lancaster (by ECF)